## Angelbeck, Richard

**From:** Angelbeck, Richard
**Sent:** Thursday, May 10, 2018 8:48 AM
**To:** nathanczuba@gmail.com
**Cc:** Nwia, Jacqueline
**Subject:** Fugitive dust information for the MATS asphalt plant in McKinley Park, IL
**Attachments:** Air Permits Training.pptx; IL Air Permitting Fact Sheet March 2018.docx; Preparing for Permit Review .ppt

Hello Mr. Czuba,

My name is Rich Angelbeck and I work at EPA Region, 5 and I've been talking to one of my co-workers, Jackie Nwia, about the MAT asphalt plant in McKinley Park.
I understand there is public interest (especially with the fugitive dust from the 100-200 truck per day traffic) in the facility because it is close to a school as well as the park.
I work in our air permits section and I see that the Illinois EPA (IEPA) issued an air permit (construction) in October, 2017 and that the facility has been built and is planning to begin operation sometime this month.
Here is a link to that permit: link. Items 9c and 10d on page 7 of the permit say that MAT needs to control fugitive dust including submitting an "operating program" to IEPA which *"shall be designed to significantly reduce fugitive particulate matter emissions*".
There are some fugitive dust best practices listed below – feel free to forward them to any community group members. These fugitive dust best practices, if in the permit and carried out properly by the facility, can help reduce dust from the facility, including the dust from the paved and/or unpaved roadways from the estimated 100 – 200 trucks per day.

Perhaps you can work with IEPA before they approve the "operating program" that MAT submits to ensure that the fugitive dust best practices are included in the operating plan.
Here's an IEPA contact that you can contact regarding the asphalt plant and the fugitive dust plan requirements for the MATS asphalt plant: Bob Bernoteit: Bob.Bernoteit@illinois.gov; 217-524-0865.
When you talk to Mr. Bernoteit, ask him if MAT will be needing a Part 70 operating permit, because if they do, the fugitive dust plan will need to be included with it, and the permit would go out for public comment which would give you an opportunity to comment on that draft permit as well as the fugitive dust plan.

Also, I attached three documents to this email – they are general information on how to review and comment on an air permit.
My contact information is below if you'd like to discuss further.

Thank you,
Rich Angelbeck
Air Permits Section
EPA, Region 5
312/886-9698

**Fugitive Dust Control Best Practices:**

**a) Paved Roadways**

- Promptly remove mud, dirt, or similar debris by sweeping the paved road at least daily.
- Water flush and/or water flush and vacuum the paved road.
- Impose speed limits of no more than 10 mph and prominently post the speed limit signs especially so they're visible to vehicles entering the facility.

- It is recommended that the Fugitive Dust Plan language specify: (1) the unpaved roadways should be monitored daily, (2) the frequency of sweeping/vacuuming/watering, e.g. twice per day, and (3) that if fugitive emissions are observed from haul roads or track-out occurs, abatement actions such as sweeping/watering shall increase in frequency until no further fugitive emissions or track-out occurs.

**b) Unpaved Roadways**

- Consider paving roadways with asphalt
- Impose speed limits of no more than 10 mph and prominently post the speed limit signs especially so they're visible to vehicles entering the facility.
- Apply water to the surface of the unpaved haul road. Control runoff so it does not saturate the surface of the unpaved haul road and cause track-out. If runoff cannot be controlled, apply gravel to the surface of the unpaved haul road over an area sufficient to control track-out.
- Apply an environmentally safe chemical soil stabilizer or chemical dust suppressant to the surface of the unpaved haul road.
- It is recommended that the Fugitive Dust Plan language specify: (1) the unpaved roadways should be monitored daily, (2) the frequency of application of the chemical dust suppressant, e.g. at least every 3 months, and (3) that records should be kept of the date the suppressant is applied and the area covered.

c) Stockpiles

- Installation of wind barriers
- Application of water or chemical suppressant as necessary
- Locate piles inside buildings if practical
- Location of piles as far away from property boundary as practical
- Implementation of a camera monitoring system
- Limit the height of the front-end-loader basket to minimize fugitive dust from the aggregate storage area
- It is recommended that the Fugitive Dust Plan language should specify: (1) the storage piles shall be sprayed with water, and (2) that if visible emissions are observed, the frequency of water application shall be increased such that no visible emissions are observed.

d) Crushing & Grinding Mills

- Limit drop heights
- Install and operate water spray bars
- Consider enclosure of sources where possible with venting of emissions to a fabric filter
- It is recommended that the Fugitive Dust Plan language specify that water application systems are required to be installed and operated on the crusher whenever it is in operation. These spray bars (or equivalent) should be on all crusher discharge points and before all fines drop points. The water application rate will be dependent on the operating capacity and type of material passing through each control point.

e) Material Loading and Unloading

- Limit drop heights
- Use a covered loading area
- Tarp aggregate hauling vehicles
- Load vehicles in a manner to prevent their contents from dropping, leaking, blowing or otherwise escaping. This may be accomplished by loading so that no part of the load shall come in contact within six inches of the top of any side board, side panel or tail gate.

f) Conveyor Transfer Points & Screening Operations

- Limit drop heights of materials

- Install and operate water spray bars during screening and conveying.
- Install and operate covers or enclosures on conveyors
- Apply controls on a frequency that prevents visible fugitive emissions.